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October 16, 2023

Via ECF

Honorable Thomas I. Vanaskie, Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower, 18th Floor
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,
No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Vanaskie:

Plaintiffs respectfully submit this letter in advance of the October 18, 2023 status conference.

1. Plaintiffs' Motion to Compel WeChat Production from ZHP

The Parties have fully briefed this motion. (ECF [2492](#), [2508](#), [2511](#)). Plaintiffs will be prepared to discuss the motion during the conference.

2. ZHP's Motion to Seal Parts of Dr. Xue's Expert Report

This motion is also fully briefed. (ECF [2459](#), [2483](#), [2495](#)). Plaintiffs will be ready to address the Court's questions during the conference.

Hon. Thomas I. Vanaskie, Special Master

October 16, 2023

Page 2

Thank you for your courtesies and consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read "Adam M. Slater", written over a horizontal line.

ADAM M. SLATER

cc: All Counsel (via CM/ECF)